

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JANELL WINFIELD, TRACEY STEWART
and SHAUNA NOEL,

Plaintiffs,

-against-

Civil Action No.:
15-CV-5236 (LTS) (KHP)

CITY OF NEW YORK,

Defendant.

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VIDEOTAPED
DEPOSITION OF ALICIA GLEN

New York, New York

November 3, 2017

9:26 a.m.

Reported by:
JUDITH CASTORE, CLR
Job No. 52429

1 GLEN

2 Q Actually, I was asking you --
3 it was a combo. It was as a human
4 being and principally as the Deputy
5 Mayor for housing and economic
6 development, which is a very specific
7 subset of human being.

8 So are you aware that
9 New York City's housing patterns were
10 shaped by forces of discrimination and
11 segregation?

12 MS. SADOK: Objection.

13 A When I became Deputy Mayor
14 for housing and economic development,
15 which I think is what you are trying to
16 get at, racial patterns was not -- or
17 race discrimination issues were not
18 front and center at all with what we
19 were deeming to be the challenges
20 facing the housing market.

21 And so that -- I actually --
22 I don't know -- again -- and I haven't
23 seen data and maps on this, as to what
24 you are describing as past practices,
25 how those are correlated -- our focus,

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2 when they came into office, was how to
3 build -- we were facing an
4 affordability crisis, right, you know,
5 which was a very different crisis than
6 what's addressed in the Koch
7 Administration or in other periods. We
8 were focusing on, you know, rent to
9 income ratios and affordable housing.

10 So I can't say that I was
11 aware of exactly what you are, I think,
12 describing as a -- how the historical
13 discrimination may have resulted. And
14 that wasn't my focus. It was really
15 affordability.

16 Q So at any point as Deputy
17 Mayor, have you become aware that
18 New York City is still characterized by
19 residential racial segregation?

20 MS. SADOK: Objection.

21 A I'm aware that -- I'm aware
22 that there have been -- I have read in
23 the paper -- and, like, these are
24 compared to Chicago or other cities --
25 I'm aware that New York City is still a

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2 city that is deemed to be quite
3 racially segregated. I have read, you
4 know, enough. Like Chicago, da, da,
5 da. Or Boston. We're not as bad as
6 Boston, I think. Again, I am not an
7 expert on what the definition is, but I
8 am aware that there are patterns of
9 racial segregation in New York City.

10 Q And are you -- does that help
11 you be aware that where people are
12 situated in New York or where groups of
13 people are situated in New York may not
14 reflect a full and voluntary choice in
15 an open marketplace?

16 MS. SADOK: Objection.

17 A What's the question?

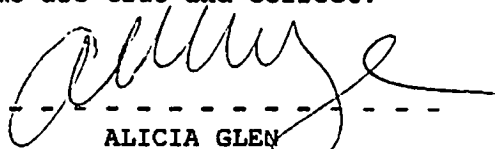
18 Q Okay. Like, you don't think
19 that African Americans in New York,
20 sometime in the 1950s, had a big
21 meeting where a motion was made and
22 carried that said, Let's all of us move
23 into Central Brooklyn, Harlem, and
24 Jamaica, right? There were forces
25 acting on people that -- race-based

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A C K N O W L E D G E M E N T

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

I, ALICIA GLEN, certify, I have read the
transcript of my testimony taken under
oath in my deposition of November 3, 2017;
that the transcript is a true, complete
and correct record of what was asked,
answered and said during this deposition,
and that the answers on the record as
given by me are true and correct.



ALICIA GLEN

Sworn and subscribed to before me
this 11 day of December 2017.



Notary Public

KATHERINE P. COCKLIN
NOTARY PUBLIC-STATE OF NEW YORK
No. 02CO6328584
Qualified in New York County
My Commission Expires August 03, 2017

STATE OF NEW YORK)
COUNTY OF NEW YORK) ss.:

That ALICIA GLEN, the witness whose deposition is hereinbefore set forth, was duly sworn by me and that this transcript of such examination is a true record of the testimony given by such witness.

I further certify that I am not related to any of the parties to this action by blood or marriage and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 8th day of November,
2017.

Judith Castore
JUDITH CASTORE